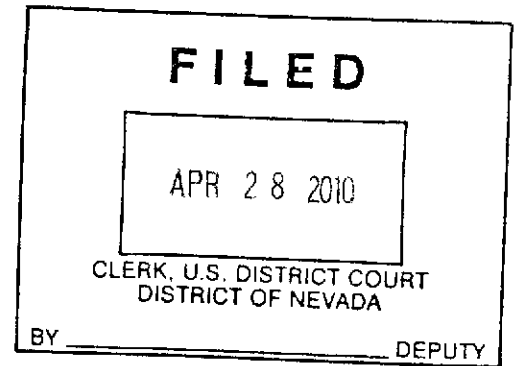


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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9 UNITED STATES OF AMERICA,

10 PLAINTIFF,

11 vs.

12 AUNDREA VALERIO,

13 DEFENDANT.

) CRIMINAL INDICTMENT

) 2:10-CR- 192

) VIOLATIONS:

) 29 U.S.C. § 501(c) - Embezzlement from
Union
29 U.S.C. § 439(c) - Falsifying Union
Records

14
15
16 **THE GRAND JURY CHARGES THAT:**

17 At all times material to this Indictment, the Laborers' International Union of
18 North America, Local 872 ("the Union"), was a labor organization engaged in an industry
19 affecting commerce, subject to the Labor Management Reporting and Disclosure Act of
20 1959, 29 U.S.C. § 401, *et seq.*, and required to file an annual financial report with the
21 Secretary of Labor.

22 **COUNT ONE**
23 **Embezzlement From Union**

24 From in or about 2006 to in or about March 2008, in the State and Federal
25 District of Nevada,

26 **AUNDREA VALERIO,**

1 defendant herein, while a person employed directly by the Union, did embezzle, steal and
2 unlawfully and willfully abstract and convert to her own use the moneys and funds of the
3 Union, that is, she stole approximately \$13,500 in membership dues and initiation fees paid
4 by union members on approximately 23 different occasions while employed as a cashier for
5 the Union.

6 All in violation of Title 29, United States Code, Section 501(c).

7 **COUNT TWO**

8 Falsification of Financial Records Required
9 To Be Kept by Labor Union
(2006)

10 From on or about January 1, 2006, to on or about December 31, 2006,
11 in the State and Federal District of Nevada,

12 **AUNDREA VALERIO,**

13 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
14 required to be kept by Title 29, United States Code, Section 436, that is, records and
15 receipts relating to membership dues and deposits, which are matters required to be
16 reported in the annual financial report of the Union that is filed with the Secretary of Labor
17 for the Union's fiscal year ending on December 31, 2006.

18 All in violation of Title 29, United States Code, Section 439(c).

19 **COUNT THREE**

20 Falsification of Financial Records Required
21 To Be Kept by Labor Union
(2007)

22 From on or about January 1, 2007, to in or about December 31, 2007, in the
23 State and Federal District of Nevada,

24 **AUNDREA VALERIO,**

25 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
26

1 required to be kept by Title 29, United States Code, Section 436, that is, records and
2 receipts relating to membership dues and deposits, which are matters required to be
3 reported in the annual financial report of the Union that is filed with the Secretary of Labor
4 for the Union's fiscal year ending on December 31, 2007.

5 All in violation of Title 29, United States Code, Section 439(c).

6
7 **COUNT FOUR**

8 Falsification of Financial Records Required
9 To Be Kept by Labor Union
10 (2008)

11 From on or about January 1, 2008, to in or about March 12, 2008, in the
12 State and Federal District of Nevada,

13 **AUNDREA VALERIO,**

14 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a
15 record required to be kept by Title 29, United States Code, Section 436 , that is, records
16 and receipts relating to membership dues and deposits, which are matters required to be
17 reported in the annual financial report of the Union that is filed with the Secretary of Labor
18 for the Union's fiscal year ending on December 31, 2008.

19 All in violation of Title 29, United States Code, Section 439(c).

20 DATED: this 28 day of April 2010.

21 A TRUE BILL:

22 ISI
23 FOREPERSON OF THE GRAND JURY

24 DANIEL G. BOGDEN
25 United States Attorney

26 
KATHRYN C. NEWMAN
Assistant United States Attorney